1 2 3 4 5 6	CONCHITA E. LOZANO-BATISTA, Bar No. 2 CRAIG L. SCHECHTER, Bar No. 308968 WEINBERG, ROGER & ROSENFELD A Professional Corporation 1375 55th Street Emeryville, California 94608 Telephone (510) 337-1001 Fax (510) 337-1023 E-Mail: courtnotices@unionsounsel.net clozano@unioncounsel.net cschechter@unioncounsel.net	27227	
7	Attorneys for Plaintiffs		
8	UNITED STATES DISTRICT COURT		
9	NORTHERN DISTRICT OF CALIFORNIA		
10			
11	THE BOARD OF TRUSTEES, in their	No. 4:21-cv-04413-HSG	
12	capacities as Trustees of the LABORERS HEALTH AND WELFARE TRUST FUND	PLAINTIFFS' REQUEST TO	
13	FOR NORTHERN CALIFORNIA, et al.,	CONTINUE CASE MANAGEMENT CONFERENCE; ORDER THEREON	
14	Plaintiffs,		
15			
16	V.		
17	PMK CONTRACTORS LLC, a California		
18	Limited Liability Company,		
19	Defendant.		
20			
21			
22	TO: THE CLERK OF THE COURT AND DI	EFENDANT PMK CONTRACTORS LLC, A	
23	California Corporation:		
24	Pursuant to Civil Local Rule 7-10, Plaintiffs hereby request that the Case Management		
25	Conference ("CMC"), currently scheduled for September 14, 2021 at 2:00 p.m., be continued for		
26	approximately sixty (60) days.		
27			
WEINBERG, ROGER & ROSENFELD A Professional Corporation 1375 55th Street Emerylike, California 94068	PLAINTIFF'S REQUEST TO CONTINUE CASE MA Case No. 4:21-cv-04413-HSG	1 NAGEMENT CONFERENCE	

Plaintiffs filed their Complaint against Defendant on June 9, 2021. Plaintiffs served the Summons and Complaint on Defendant by substituted service on June 15, 2021. Plaintiffs filed a proof of service with this Court on June 16, 2021.

On July 6, 2021, the parties filed a joint Stipulation Extending Time to Answer Complaint. On July 7, 2021, this Court issued an Order extending the date for Defendant to file a response pleading until July 16, 2021. On July 16, 2021, Defendant filed an Answer to the Complaint.

Since July 16, 2021, counsel for the parties have been in actively communicating with one another regarding a settlement to this matter. The parties believe that a settlement is forthcoming. For these reasons, Plaintiffs request that the Court continue the September 14, 2021 Case Management Conference for approximately sixty (60) days.

The above stated facts are set forth in the accompanying Declaration of Craig L. Schechter in Support of Plaintiffs Request Continue Case Management Conference, filed herewith.

Dated: September 10, 2021 WEINBERG, ROGER & ROSENFELD A Professional Corporation

By: /s/ Craig L. Schechter
CRAIG L. SCHECHTER
Attorneys for Plaintiffs

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## ORDER CONTINUING CASE MANAGEMENT CONFERENCE

Based upon the foregoing Request to Continue of Case Management Conference and Declaration of Craig L. Schechter in Support thereof, the Court orders a continuance of the September 14, 2021 Case Management Conference for approximately sixty (60) days, or as soon thereafter as a court date is available.

HON

United

Dated: 9/10/2021

PLAINTIFF'S REQUEST TO CONTINUE CASE MANAGEMENT CASE MA

DENIED

Haywood S. Iell

Judge Haywood S. Gilliam Jr.

**E**LIAM, JR.

frict Judge

WEINBERG, ROGER &
ROSENFELD
A Professional Corporation

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Professional Corporation
1375 55th Street
meryville, California 94608
(510) 337-1001

PLAINTIFF'S REQUEST TO
Case No. 4:21-cv-04413-HSG

1	CONCHITA E. LOZANO-BATISTA, Bar No. 227227 CRAIG L. SCHECHTER, Bar No. 308968 WEINBERG, ROGER & ROSENFELD				
2					
3	A Professional Corporation 1375 55th Street Emeryville, California 94608 Telephone (510) 337-1001 Fax (510) 337-1023				
4					
5					
	E-Mail: courtnotices@unionsounsel.net clozano@unioncounsel.net				
6	cschechter@unioncounsel.net				
7	Attorneys for Plaintiffs				
8	UNITED STATES DISTRICT COURT				
9	NORTHERN DISTRICT OF CALIFORNIA				
10					
11	THE BOARD OF TRUSTEES, in their	No. 3:21-cv-04413-HSG			
12	capacities as Trustees of the LABORERS	DECLARATION OF CRAIG L.			
13	HEALTH AND WELFARE TRUST FUND FOR NORTHERN CALIFORNIA, et al.,	SCHECHTER IN SUPPORT OF PLAINTIFFS' REQUEST TO			
14	Plaintiffs,	CONTINUE CASE MANAGEMENT CONFERENCE			
15	Trainerius,	CONFERENCE			
16	V.				
17	PMK CONTRACTORS LLC, a California				
18	Limited Liability Company,				
19	Defendant.				
20					
21					
22	I Craig I Schechter declare as follows:				
	I, Craig L. Schechter, declare as follows:				
23	1. I am an attorney with the law firm of Weinberg Roger and Rosenfeld, located at				
24	1375 55 <sup>th</sup> Street, Emeryville, California, 94608, the attorneys for Plaintiffs in this matter. I have				
25	knowledge of the facts stated in this Declaration an	a i could and would testify competently			
26	thereto.	Y 0.0004			
27	2. Plaintiffs filed their Complaint in thi	s matter on June 9, 2021.			
28	DECLARATION OF CRAIG L. SCHECHTER IN SUPP	ORT OF PLAINTIFF'S REQUEST TO CONTINUE			

WEINBERG, ROGER & ROSENFELD
A Professional Corporation
1375 55th Street
Emeryville, California 94608
(510) 337-1001

DECLARATION OF CRAIG L. SCHECHTER IN SUPPORT OF PLAINTIFF'S REQUEST TO CONTINUI CASE MANAGEMENT CONFERENCE Case No. 3:21-cv-04413-HSG

1	3.	Defendant was served by substituted service on June 15, 2021. Plaintiffs filed a		
2	proof of service with this Court on June 16, 2021.			
3	4.	On July 6, 2021, the parties filed a joint Stipulation Extending Time to Answer		
4	Complaint.			
5	5.	On July 7, 2021, this Court issued an Order extending the date for Defendant to		
6	file a respons	ponse pleading until July 16, 2021.		
7	6.	Defendant filed an Answer to the Complaint on July 16, 2021.		
8	7.	Since that date, counsel for the parties have been actively communicating with one		
9	another regarding settlement of this matter. The parties believe that a settlement is forthcoming.			
10	8.	Based upon these facts, Plaintiffs request that the Case Management Conference		
11	currently set for September 14, 2021 at 2:00 P.M. be continued for approximately sixty (60) days			
12	to allow the parties to finalize the terms of a settlement.			
13	I declare under penalty of perjury that the forgoing is correct.			
14	Dated: September 10, 2021 WEINBERG, ROGER & ROSENFELD			
15				
16			/a/Cusia I. Sahashtau	
17		By:	/s/ Craig L. Schechter CRAIG L. SCHECHTER Attorneys for Plaintiffs	
18	151(09\1202521		Attorneys for Flaminis	
19	151698\1203521			
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WEINBERG, ROGER & ROSENFELD

A Professional Corporation 1375 55th Street Emeryville, California 94608 (510) 337-1001